

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

IN RE: BROILER CHICKEN GROWER
ANTITRUST LITIGATION (NO. II)

This document relates to all actions.

Case No. 6:20-MD-02977-RJS-CMR

Chief Judge Robert J. Shelby

Magistrate Judge Cecilia M. Romero

**DECLARATION OF DAVID A. LANGER IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN ORDER COMPELLING DEFENDANT PILGRIM'S
PRIDE TO PRODUCE CERTAIN DOCUMENTS FOR FAILURE TO SHOW THAT
THE DOCUMENTS ARE PRIVILEGED**

I, David A. Langer, hereby declare that the following is true and correct:

1. I am an attorney with the law firm of Berger Montague PC. I am fully familiar with the facts contained herein based upon my personal knowledge, and I submit this Declaration in support of Plaintiffs' Motion for an Order Compelling Defendant Pilgrim's Pride to Produce Certain Documents for Failure to Show That the Documents are Privileged.

2. Attached as Exhibit 1 are true and correct copies of four Pilgrim's Pride Corporation privilege logs: (i) a revised August 31, 2020 log with 118 entries; (ii) a December 14, 2020 log with 28 entries; (iii) a December 21, 2020 log with 16 entries; and (iv) a December 22, 2020 log with 24,687 entries.

3. Attached as Exhibit 2 is a true and correct copy of a letter from Lauren Alexander to David Langer, dated June 3, 2021.

4. Attached as Exhibit 3 is a true and correct copy of a letter from David Langer to Robert Dahnke, dated March 10, 2021.

5. Attached as Exhibit 4 is a true and correct copy of a letter from Robert Dahnke to David Langer, dated March 22, 2021.

6. Attached as Exhibit 5 is a true and correct copy of a letter from David Langer to Kristin Kroger, Robert Dahnke and Bradley Justus, dated April 13, 2021.

7. Attached as Exhibit 6 is a true and correct copy of a letter from Robert Dahnke to David Langer, dated May 17, 2021.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 2, 2021.

/s/ David A. Langer
David A. Langer